

January 29, 2016
(file: 2059)

(via email)

Mr. Scott Rice
United States Environmental Protection Agency
Waste and Chemicals Division
1060 Chapline Street
Suite 303
Wheeling, WV 26003-2995

**RE: PCB Transformer Removal - Serial Numbers C858009 and
C858010
Benjamin Franklin High School
550 North Broad Street
Philadelphia, Pennsylvania 19141**

**KEATING
ENVIRONMENTAL
MANAGEMENT, INC.**

835 Springdale Drive
Suite 200
Exton, PA 19341

610.594.2600 P
610.594.6100 F

keatingenvironmental.com



**KEATING
ENVIRONMENTAL
MANAGEMENT**

*Environmental,
Energy &
Sustainability
Solutions*

Dear Scott:

This letter provides USEPA with formal notification that the two PCB transformers which had been located at the School District of Philadelphia's Benjamin Franklin High School were removed from service without incident this past July (July 2015). In addition, this letter includes, for your records, the applicable manifests and final disposal documents.

The transformers that were removed were manufactured by the General Electric Company (Serial Numbers C858009 and C858010). According to transformer nameplate data, each transformer contained 810 gallons (approximately 10,600 pounds) of Pyranol fluid. These transformers had been operating under a Consent Decree between the School District of Philadelphia and the United States Environmental Protection Agency since March 1997.

As part of the project associated with the removal and replacement of the PCB transformers, a technical specification that included a description of the environmental requirements for the removal and disposal of the PCB transformers in accordance with the Consent Decree and applicable state and federal regulations was prepared.

A contract for the replacement of the transformers, inclusive of decommissioning and disposal of the PCB transformers was awarded to Eagle Industrial Electric, Inc. (EIE). EIE subcontracted various aspects of the work, including the transformer draining, the transportation and disposal of the PCB transformers, the dielectric fluid and debris associated with PCB activities to Clean Harbors Environmental Services.

Keating Environmental was on-site during the decommissioning and removal of the PCB transformers. The process was performed without incident. A post-removal inspection of the floor area proximate to the former transformers and work areas revealed no evidence of leaks or spills.

A WBE Certified
Corporation



Printed on
recycled paper



Mr. Scott Rice
United States Environmental Protection Agency
January 29, 2016
Page 2 of 2

For your records, I have enclosed documentation regarding the disposal of the transformers, the dielectric fluid and debris generated during the removal of the transformers.

Please contact me if you have any questions or comments.

Regards
KEATING ENVIRONMENTAL MANAGEMENT, INC.



Keith Choper, PE, LEED-AP
President



Attachments: Uniform Hazardous Waste Manifests with supporting documentation – Manifests 008068335FLE and 008068453FLE

cc: Ms. Francine Locke, Mr. Jerry Junod – School District of Philadelphia (via email)
File 5385
File 2059

Benjamin Franklin HS
Complete Disposal Documentation - January 28, 2016

Manifest	Manifest Line No.	Material	Number of Containers	Certificate of Disposal On-File, disposal date
008068335 FLE	1	liquid - oil	3	8/9/2015
008068335 FLE	2	solid - drum	1	9/18/2015
008068335 FLE	3	transformer	1	1/7/2016
008068453FLE	1	liquid - oil	3	12/20/2015
008068453FLE	2	transformer	1	1/12/2016
008068453FLE	3	solid - drum	3	9/18/2015

Benjamin Franklin HS
PCB Disposal Documentation
Manifest 008068335 FLE

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number 40CFR PART 761	2. Page 1 of 1	3. Emergency Response Phone (800) 483-3718	4. Manifest Tracking Number 008068335 FLE
5. Generator's Name and Mailing Address School District of Philadelphia Ben Franklin High School 440 N. Broad Street 3rd floor Portal C Philadelphia, PA 19130		6. Generator's Site Address (if different than mailing address) Ben Franklin High School 550 North Broad St Philadelphia, PA 19130			
6. Transporter 1 Company Name Clean Harbors Environmental Services Inc		U.S. EPA ID Number MAD039322250			
7. Transporter 2 Company Name		U.S. EPA ID Number			
8. Designated Facility Name and Site Address Clean Harbors PPM LLC 1672 East Highland Road Twinsburg, OH 44087		U.S. EPA ID Number OH0986975399			
9a. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))		10. Containers No. Type		11. Total Quantity	12. Unit Vol./Wt.
1. RO, UN2315, POLYCHLORINATED BIPHENYLS, LIQUID, (POLYCHLORINATED BIPHENYL), 9, PG III (PCB)		3 CM		4800 K	
2. UN3432, POLYCHLORINATED BIPHENYLS, SOLID, (PPE), 9, PG III		1 DM 89		6091 K	
3. RO, UN2315, POLYCHLORINATED BIPHENYLS, LIQUID, (POLYCHLORINATED BIPHENYLS) (PCBS), 9, PG III (PCB)		1 CM		6091 K	
13. Waste Codes					
14. Special Handling Instructions and Additional Information 1. PPMCH3 ERG#171 2. PPMCHSL ERG#171 3. PPMCHTRH ERG#171 <i>Send copy to Keating Environ. Mgmt 835 Springdale Dr. Ste. 200 Tel 252-018 OSD 7-1-15 Extra, An 19341</i>					
15. GENERATOR'S OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled (packaged), and are in all respects in proper condition for transport according to applicable international and national government regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste management statement described in 40 CFR 267.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.					
Generator's Name and Title Paul Davis Authorized Agent for SDP		Signature <i>Paul Davis</i>		Month Day Year 7 2 15	
16. International Shipments: <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____					
17. Transporter Acknowledgment of Receipt of Materials Transporter 1 Printed Name: Alex Caulder Signature: <i>Alex Caulder</i> Month Day Year: 7 2 15					
Transporter 2 Printed Name: _____ Signature: _____ Month Day Year: _____					
18. Discrepancy 18a. Discrepancy Indication Space: <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection					
18b. Alternate Facility (for Generator): _____ Manifest Reference Number: _____ U.S. EPA ID Number: _____					
Facility's Phone: _____					
18c. Signature of Alternate Facility (for Generator): _____ Month Day Year: _____					
19. Hazardous Waste Report Management Method: 1. H141 2. H141 3. H141 4.					
20. Designated Facility Operator: _____ Signature: <i>RK</i> Month Day Year: 7 18 15					

****Each Unit Must Be Marked On Sheet With All Corresponding Information Filled In****

GENERATOR School District of Philadelphia
New Franklin High School

MANIFEST 008068335 Pg 1 of 1

UNIT TYPES:
DM=DRUM METAL
DF=DRUM FIBER
CM=CONTAINER METAL

Phase
Single Phase
Three Phase

MATERIAL TYPE:	
SWITCH	OCB
BUSHING	OIL
CAPACITOR	TRANSFORMER

TRANSFORMER TYPE:
POLE
PAD
SUBSTATION



Clean Harbors PPM LLC
1672 East Highland Road
Twinsburg OH, 44087
OHD986975399
(330) 425-3825

CERTIFICATE OF DISPOSAL

Generator Facility Name: Ben Franklin High School
Generator Address: 440 N. Broad Street 3rd floor Portal C
Philadelphia, PA, 19130
Generator Contact Name:

Sales Order#: 1502104679
Date Received: 7/8/2015

Generator EPA ID: NONEREQUIRED

Load #:
Manifest #: 008068335FLE

Original CH ID #	Date Removed From Service	Unit Type	Serial # / Customer ID	Material Description	Disposal Date	Method of Disposal	Disposal Facility
45914340	7/1/2015	TP	T-10 /	High Btu PCB Liquids For Incineration	8/9/2015	Incineration	Aragonite, UT Facility
45914341	7/1/2015	TP	T-11 /	High Btu PCB Liquids For Incineration	8/9/2015	Incineration	Aragonite, UT Facility
45914342	7/1/2015	TP	T-12 /	High Btu PCB Liquids For Incineration	8/9/2015	Incineration	Aragonite, UT Facility

Under Civil and Criminal Penalties of Law for the making or submission of false or fraudulent statements or representations (18 U.S.C. 1001 and 15 U.S.C. 2615), I certify that the information contained in or accompanying this document is true, accurate, and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the persons who, acting under my direct instructions, made the verification that this information is true, accurate, and complete.

Shantanu S. Pahi

Authorized Agent

Tuesday, August 11, 2015

Date



Clean Harbors PPM, LLC
1672 East Highland Road
Twinsburg OH, 44087
OHD986975399
(330) 425-3825

CERTIFICATE OF DISPOSAL

Generator Facility Name: Ben Franklin High School
Generator Address: 440 N. Broad Street 3rd floor Portal C
Philadelphia, PA, 19130

Sales Order#: 1502104679
Date Received: 7/8/2015

Generator Contact Name:

Generator EPA ID: NONEREQUIRED

Load #:
Manifest #: 008068335FLE

Original CH ID #	Date Removed From Service	Unit Type	Serial # / Customer ID	Material Description	Disposal Date	Method of Disposal	Disposal Facility
45914343	7/1/2015	DM	BF-1 /	PCB Solids For Landfill	9/18/2015	Landfill	Grassy Mountain, UT Facility

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Shantanu S. Pahi
Authorized Agent

Monday, September 21, 2015
Date



Clean Harbors PPM, LLC
1672 East Highland Road
Twinsburg OH, 44087
OHD986975399
(330) 425-3825

CERTIFICATE OF DISPOSAL

Manifest Mailing Name: Ben Franklin High School
Manifest Mailing Address: 440 N. Broad Street 3rd floor Portal C Philadelphia, PA, 19130
Job Address: 550 North Board St Philadelphia, PA 19130
Customer Contact Name: Mr Gerald Rothstein

					Date Received:	7/8/2015	
Generator EPA ID:	40CFRPART761			Load #:			
Sales Order#:	1502104679			Manifest #:	008068335FLE-		
Original CH ID #	Date Removed From Service	Unit Type	Serial # / Customer ID	Material Description	Disposal Date	Method of Disposal	Disposal Facility
46233792	7/1/2015	CM	C850009 / 45914344	Transformer	1/7/2016	Decommission	Coffeyville, KS Facility

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Shantanu S. Pahi
Authorized Agent

Friday, January 08, 2016
Date

Benjamin Franklin HS
PCB Disposal Documentation
Manifest 008068453 FLE

46495069-5875

Please print or type. (Form designed for use on side (12-pitch) typewriter)

Form Approved: OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number 40 CFR PART 761		2. Page 1 of		3. Emergency Response Phone 800-483-3718		4. Manifest Tracking Number 008068453 FILE																					
5. Generator's Name and Mailing Address School District of Philadelphia 440 N. Broad Street, 3rd Floor Portal C Philadelphia, PA 19130 215-480-5213 ATTN: Francine Locke					6. Generator's Site Address (if different than mailing address) Ben Franklin High School 550 North Board Street Philadelphia, PA 19130																								
7. Transporter 1 Company Name Clean Harbors Environmental Services, Inc.					U.S. EPA ID Number MAD03932225																								
8. Designated Facility Name and Site Address Clean Harbors DPM, LLC 1672 E Highland Rd Twinsburg, OH 44087					U.S. EPA ID Number																								
9a. U.S. DOT (Description including Proper Shipping Name, Hazard Class, ID Number, and Packing Group, if any)																													
10. Containers																													
<table border="1"> <thead> <tr> <th>No.</th> <th>Type</th> <th>11. Total Quantity</th> <th>12. Unit (if any)</th> <th>13. Waste Codes</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>RQ, UN2315, Polychlorinated Biphenyls, Liquid, 9, PG III</td> <td>003</td> <td>TP</td> <td>4749 K NONE</td> </tr> <tr> <td>2</td> <td>RQ, UN2315, Polychlorinated Biphenyls, Liquid, 9, PG III</td> <td>001</td> <td>CM</td> <td>5911 K NONE</td> </tr> <tr> <td>3</td> <td>RQ, UN3432, Polychlorinated Biphenyls, Solid, 9, PG III</td> <td>003</td> <td>DM</td> <td>204 K NONE</td> </tr> </tbody> </table>										No.	Type	11. Total Quantity	12. Unit (if any)	13. Waste Codes	1	RQ, UN2315, Polychlorinated Biphenyls, Liquid, 9, PG III	003	TP	4749 K NONE	2	RQ, UN2315, Polychlorinated Biphenyls, Liquid, 9, PG III	001	CM	5911 K NONE	3	RQ, UN3432, Polychlorinated Biphenyls, Solid, 9, PG III	003	DM	204 K NONE
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14. Special Handling Instructions (on 1440-001-01-00000)																													
1: PPMCH3 2: PPMCHTRH 3: PPMCHSL ERG #171 FLEET# 255029 JOB# 1502104679 OSD 7-27-15 Mail copy to KEN 835 Springdale Dr. Ste 200 Exton, PA 19341																													
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Generator's/Officer's Printed/Typed Name: Paul Davis Authorized Agent for School Dist. of Phila. Authorized Agent for SDP Month: 07 Day: 30 Year: 15																													
16. International Shipments: <input type="checkbox"/> Export to: <input type="checkbox"/> Export from U.S. Port of embarkment: Date leaving U.S.:																													
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18b. Alternate Facility for Generator: Manifest Rejection Number: U.S. EPA ID Number:																													
Facility's Phone: Month: Day: Year:																													
19. Signature of Alternate Facility for Generator: Month: Day: Year:																													
20. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)																													
1 2 3 4																													
21. Designated Facility Owner or Operator: Printed/Typed Name: R Knight Signature: R Knight Month: 18 Day: 06 Year: 15																													

EPA Form 8700-22 (Rev. 3-05). Previous editions are obsolete.

DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

****Each Unit Must Be Marked On Sheet With All Corresponding Information Filled In****

"THIS PAGE MUST MATCH THE MANIFEST IT ACCOMPANIES" AND MUST ACCOMPANY ALL MANIFESTS

Pg / of /

MANIFEST 008068453 FLE

UNIT TYPES:
DM=DRUM METAL
DF=DRUM FIBER
CM=CONTAINER METAL

Phase
Single Phase
Three Phase

MATERIAL TYPE:	
SWITCH	OCB
BUSHING	OIL
CAPACITOR	TRANSFORMER

TRANSFORMER TYPE:
POLE
PAD
SUBSTATION



Clean Harbors PPM, LLC
1672 East Highland Road
Twinsburg OH, 44087
OHD986975399
(330) 425-3825

CERTIFICATE OF DISPOSAL

Generator Facility Name: Ben Franklin High School
Generator Address: 440 N Broad Street 3rd floor Portal C
Philadelphia, PA, 19130

Sales Order#: 1502104679
Date Received: 7/30/2015

Generator Contact Name:

Generator EPA ID: 40CFRPART761

Load #:

Manifest #: 008068453FLE

Original CH ID #	Date Removed From Service	Unit Type	Serial # / Customer ID	Material Description	Disposal Date	Method of Disposal	Disposal Facility
46495069	7/27/2015	TP	TW13 /	High Btu PCB Liquids For Incineration	12/20/2015	Incineration	Deer Park, TX Facility
46495070	7/27/2015	TP	TW1 /	High Btu PCB Liquids For Incineration	12/20/2015	Incineration	Deer Park, TX Facility
46495071	7/27/2015	TP	TWSS /	High Btu PCB Liquids For Incineration	12/20/2015	Incineration	Deer Park, TX Facility

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Shantanu S. Pahi

Authorized Agent

Monday, December 21, 2015

Date



Clean Harbors PPM, LLC
1672 East Highland Road
Twinsburg OH, 44087
OHD986975399
(330) 425-3825

CERTIFICATE OF DISPOSAL

Manifest Mailing Name: Ben Franklin High School
Manifest Mailing Address: 440 N. Broad Street 3rd floor Portal C Philadelphia, PA, 19130
Job Address: 550 North Board St Philadelphia, PA 19130
Customer Contact Name: Mr Gerald Rothstein

Date Received:		7/30/2015					
Generator EPA ID:	40CFRPART761	Load #:					
Sales Order#:	1502104679	Manifest #:	008068453FLE				
Original CH ID #	Date Removed From Service	Unit Type	Serial # / Customer ID	Material Description	Disposal Date	Method of Disposal	Disposal Facility
46495072	7/27/2015	CM	C858010 / T-1	Transformer	1/12/2016	Decommission	Coffeyville, KS Facility

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Shantanu S. Pahi
Authorized Agent

Wednesday, January 13, 2016
Date



Clean Harbors PPM, LLC
1672 East Highland Road
Twinsburg OH, 44087
OHD986975399
(330) 425-3825

CERTIFICATE OF DISPOSAL

Generator Facility Name: Ben Franklin High School
Generator Address: 440 N. Broad Street 3rd floor Portal C
Philadelphia, PA, 19130
Generator Contact Name:

Sales Order#: 1502104679
Date Received: 7/30/2015

Generator EPA ID: NONEREQUIRED

Load #:
Manifest #: 008068453FLE

Original CH ID #	Date Removed From Service	Unit Type	Serial # / Customer ID	Material Description	Disposal Date	Method of Disposal	Disposal Facility
46495073	7/27/2015	DM	1 / D-1	PCB Solids For Landfill	9/18/2015	Landfill	Grassy Mountain, UT Facility
46495074	7/27/2015	DM	2 / D-2	PCB Solids For Landfill	9/18/2015	Landfill	Grassy Mountain, UT Facility
46495075	7/27/2015	DM	3 / D-3	PCB Solids For Landfill	9/18/2015	Landfill	Grassy Mountain, UT Facility

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Shantanu S. Pahi
Authorized Agent

Monday, September 21, 2015
Date